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9
10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

12 In re

13 Nicholas Clifton Barnard,

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15 Debtor.

Case No. 20-11870 – TWD

EX PARTE STIPULATION AND
[PROPOSED] ORDER FOR
WITHDRAWAL OF MICHELLE C.
KAPLAN

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18 I. STIPULATION

19 Pursuant to LBR 2089-1(b)(1), the undersigned parties stipulate and agree that
20 Michelle C. Kaplan of Kaplan Law shall be allowed to withdraw as counsel for Mr. Nicholas
21 C. Barnard. On August 18, 2015, Michelle C. Kaplan, counsel for the Debtor Nicholas C.
22 Barnard (the “Debtor”), and the Debtor entered into a Representation and Fee Agreement
23 (the “Agreement”). The Agreement provided that Ms. Kaplan would represent the Debtor in
24 an uncontested Chapter 7 bankruptcy for a flat fee. The Agreement further provided that if
25 the proceeding were to become contested, the parties would enter into a new fee agreement.
26 Once this case became an asset case, the Debtor filed proofs of claims for his family and

Barnard Stip & Order
Re: Withdrawal - 1

KAPLAN LAW PLLC
2155 - 112th Ave. NE
Bellevue, WA 98004
Phone: 425-818-4818
Fax: 425-484-4444

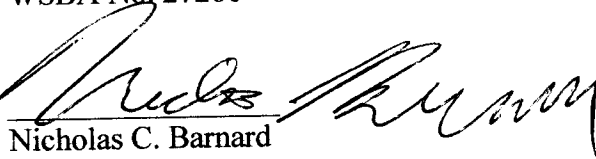
1 friends and his student loans. The amount at stake to be distributed to the general unsecured
2 creditors in this case does not justify entering into a new fee agreement with Ms. Kaplan.
3 Consequently, the Debtor would like to proceed on his own. The hearing on the Trustee's
4 objections to the Debtor's filed proofs of claims is continued to April 23, 2021 at 9:30 am
PDT and to be heard telephonically. Mr. Barnard's contact information is:

Nicholas C. Barnard
6806 Oswego PL NE, #101
Seattle, WA 98115
206-457-6045
nick@innmff.net

9 DATED this 7th Day of April 2021.

10 **KAPLAN LAW PLLC**

11 By: /s/ Michelle C. Kaplan
12 Michelle Carmody Kaplan
13 WSBA No. 27286

14 By: 
15 Nicholas C. Barnard

19 **II. ORDER**

20 The Court, having reviewed the above stipulation, and being fully advised in the
21 premises, it is hereby ORDERED that Michelle C. Kaplan of Kaplan Law PLLC is
22 granted leave to withdraw as counsel for Nicholas C. Barnard and is hereby terminated
as counsel for the same.

23 **///End of Order///**

26 Barnard Stip & Order
Re: Withdrawal - 2

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1 Presented by:

2
3 **KAPLAN LAW PLLC**

4 By: /s/ Michelle C. Kaplan
Michelle Carmody Kaplan
5 WSBA No. 27286

6
7 By: 
Nicholas C. Barnard

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Barnard Stip & Order
Re: Withdrawal - 3

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